TROY LAW, PLLC

ATTORNEYS / COUNSELORS AT LAW

Tel: 718 762 1324 <u>troylaw@troypllc.com</u> Fax: 718 762 1342 41-25 Kissena Blvd., Suite 103, Flushing, New York 11355

September 12, 2021

Via ECF

Hon. John G. Koeltl United Sates District Judge Southern District of New York Daniel Patrick Moynihan United States Courthouse

500 Pearl St.

New York, NY 10007-1312

APPLICATION GRANTED SO ORDERED

John G. Koeltl, U.S.D.J.

Re: Plaintiff's Request for Extension of Time to File Plaintiffs' Reply Memorandum in Support of their Class Motion and Request to File in Excess of Page Limit 18-cv-07342-(JGK)-(BM) Rodolfo Tecocatzio-Ortiz et al. v Just Salad et.al.

Your Honor,

We represent the Plaintiffs in the above referenced matter. We write, with the consent of Defendants, for a two-week extension for Plaintiffs' Reply Memorandum in Further Support of Plaintiffs' Class Motion, which is currently due September 17, 2021, to be extended until October 1, 2021. This is Plaintiffs' first request.

We also write to request permission to file an oversized reply to Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Class Certification (See Docket Entry 152 [D.E. 52]). This is also Plaintiffs' first request. We sincerely apologize for not requesting permission previously before submitting memorandum above Your Honor's word count. Defendants do not consent to this request.

Your Honor's rules provide that, absent prior permission reply memoranda are limited to 2,800 words or fewer. All memoranda shall contain a certificate signed by counsel stating the number of words in the brief and certifying that the brief complies with these formatting rules. Due to the large number of Plaintiffs in this matter our reply brief as currently drafted will exceed the word limit.

Dated: September 3, 2021

Respectfully submitted,
/s/ John Troy
John Troy
Aaron Schweitzer
Tiffany Troy
Attorney for Plaintiffs